



# NOTRE DAME™

## Preparatory High School

9701 East Bell Road  
Scottsdale, Arizona 85260  
Phone 480-634-8200  
Fax 480-634-8299  
NDPSaints.org

**October 11, 2017**

Chairman Ajit Pai  
Commissioner Mignon Clyburn  
Commissioner Michael O'Rielly  
Commissioner Brendan Carr  
Commissioner Jessica Rosenworcel  
c/o Marlene H. Dortch, Secretary

Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch,

On behalf of Notre Dame Preparatory High School, located in Scottsdale, Arizona, that provides approximately **10** performances per year to 2,000 audience members and education programs to 1,200 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

Notre Dame Preparatory High School Drama is dedicated to creating a collaborative learning environment with high quality education in the performing arts. We strive to elicit creative self-expression, critical thinking, and artistry. We are committed to presenting shows that will continue to delight, entertain and educate audiences.

I strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

School theatre programs and professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while limiting significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to educational theatre, both in the training and safety of students, onstage and backstage.

CONFIRMANS MENTES CORPORA ET ANIMAS



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We currently own and use 20 Shure Incorporated wireless microphones for our productions, 5 of which are handheld units and the other 15 are over the ear units. To be in compliance with previous rulings, we purchased these units at a cost of approximately \$14,000. In the course of the school year we will hold 10 performances. The Bands we utilize on our microphones have the following breakdown:

- bands and channels
  - 5 units - Low UHF (channels 14–36, 470 to 608 MHz)
  - 15 units - High UHF (channels 38–51, the 600 MHz band, 614 MHz to 698 MHz)

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

Thank you for seeking Public Comment on this very important issue. It is vital for educational institutions to have access to reliably available spectrum with interference protection. The move out of the 700 MHz band cost us a significant investment which could have gone to help more of our serving community.

Our School theatre program provides a great to our neighboring community. Through our productions we serve as a hub for entertainment, dialogue, and affirmation of student achievement and growth in important 21<sup>st</sup> century skills, such as creativity and collaboration. I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate schools and performing arts organizations that use fewer than 50 wireless microphones. The proposal is a much-needed solution that benefits the arts community and the public as well as the many new and emerging unlicensed white space technologies.

Sincerely,

Jack Sera  
Notre Dame Theater Saints President